

REMARKS

This Amendment responds to the Office Action dated March 18, 2009.

The Examiner objected to claims 17 and 31 for informalities that have been corrected by the present amendment. The applicant has also canceled several dependent claims that are redundant in view of amendments to the independent claims from which they depend.

The Examiner rejected all pending claims under 35 U.S.C. § 103(a) as being unpatentable over the combination of “JPEG 2000 Image Coding System”, Final Committed Draft, v 1.0 (March 16, 2000) (hereinafter IT-JPEG 2000) in view of Paek et al., U.S. Patent No. 7,143,434 (hereinafter Paek).

Independent claims 1, 15, 29, and 47, as amended, recite the limitations of a digital file arranged according to the JPEG 2000 specification and that that includes both information for rendering an image and information providing “user-interactivity with the rendered said image; where said digital file is stored on said computer-readable medium using a single file extension and includes computer-executable instructions for enacting said interactivity. This limitation is supported by the specification at p. 4 lines 15-16 (stating that the JPEG 2000 format is “self-contained”); *Id.* at p. 5 lines 1-10, p. 5 line 21- p. 6 line 3; (stating that the information providing interactivity is preferably provided within the JPEG 2000 file); *Id.* at 6-8p. 7 lines 6-8 (stating that the binary code data executing the interactivity is also preferably included in the JPEG 2000 file.) Neither Paek nor JPEG 2000 discloses this limitation.

Paek merely discloses a description scheme that documents whatever characteristics are in a file for search and retrieval purposes. For example, if an image contains an object, the

description scheme of Paek may define the boundary around that object. If an image may be described in words, the description scheme of Paek permits that description. However, none of these attributes of the description scheme itself provides interactivity with the image rendered.

The Examiner cites to portions of Paek indicating that the description scheme may include links to “external information.” A review of these passages indicates that Paek is only referring to links to “extraction code” that allows a search engine to parse the image content when determining whether the image matches search terms. *See* Paek at col. 14 lines 9-17. At best, these links provide interactivity between a user of a search engine and the binary file described by Paek’s description scheme, but it does not provide interactivity between a user and *the image within the file* that is rendered on a display. Moreover, the links included in the description scheme are not disclosed as being embedded in the file itself, and even if they were, the links do not provide the interactivity, but instead it is the external code *linked to* that provides that interactivity.

Similarly, the Examiner’s recitation to the portions of Paek disclosing the ability to transcode an image into an audio file has no bearing on the limitations as claimed. First, the transcoded image sent to, say a cell phone, is not user-interactive, i.e. a user of a cell phone who receives the file hears a description of objects rather than seeing them, but the user is still passive. Moreover, as in the case above, the information used to provide the transcoded audio information is not within the file structure itself. *See* Paek at col. 13 lines 35-37 (“The image descriptor in question can *point to* code for transcoding an image object into different modalities

and resolutions, in order to satisfy the requirements of different user terminals.”)(emphasis added).

The applicant respectfully suggests that the Examiner is reading too much into the comment in Paek that the description scheme disclosed therein may be used with “any type of standard which describes image content.” The description scheme of Paek is disclosed in reference to the MPEG-7 standard, which is used to describe the content of video sequences. Hence, most of the functions described in that standard will naturally be unique to video and inapplicable to the prior art usage of other image content, i.e. still images. Video sequences on DVDs, for example, typically include “hot spots” that provide user interactivity via links to external information regarding actors portrayed, etc. Naturally, a description scheme intended to be used with MPEG-7 will logically include descriptors that map the objects comprising the hot spots as well as the links to external information. It does not follow, however, that these descriptors would be relevant to still images, such as those rendered in the JPEG-2000 image format, for the simple reasons that the prior art does not disclose that still images rendered in the JPEG-2000 file format are interactive as are video sequences. Thus, the mere disclosure in Paek that the description scheme intended to be used in an MPEG-7 may be *generically* extended to other image description standards, does not render obvious a *specific* implementation of that disclosed description scheme in another specific standard.

For the foregoing reasons, the applicant respectfully requests that the Examiner’s rejection of claims 1-3, 4-17, 19-31, 34-40, 47-49, and 52-59 be withdrawn.

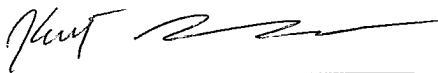
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The applicant has added new claim 60, which includes the limitation of "at least one of said boxes containing an audio file, where said digital file is stored on said computer-readable medium using a single file extension and includes computer-executable instructions for playing said audio file." This limitation is disclosed in the specification at p. 14 lines 6-9 and p. 27 lines 9-17. This limitation distinguishes over the cited prior art for the same reasons as stated above.

In view of the foregoing amendments and remarks, the applicant respectfully requests reconsideration and allowance of claims 1-3, 5-17, 19-31, 233-40, and 47-59.

Respectfully submitted,

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Date



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